

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: §
§
§ Chapter 11
ALEXANDER E. JONES, §
§
§ Case No. 22-33553
Debtor §

**CONNECTICUT PLAINTIFFS'
AMENDED NOTICE OF RULE 2004 DEPOSITION OF DAVID JONES**

To: David Jones, by and through his counsel of record, Stephen A. Roberts, STEPHEN A. ROBERTS, P.C., 1400 Marshall Lane, Austin, Texas 78703-3407

PLEASE TAKE NOTICE that, pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the Bankruptcy Rules) and Local Rule 2004-1 of the United States Bankruptcy Court for the Southern District of Texas (the Local Rules), David Wheeler, Francine Wheeler, Jacqueline Barden, Mark Barden, Nicole Hockley, Ian Hockley, Jennifer Hensel, Donna Soto, Carlee Soto Parisi, Carlos M. Soto, Jillian Soto-Marino, William Aldenberg, William Sherlach, Robert Parker, and Richard M. Coan, as Chapter 7 Trustee for the Estate of Erica Lafferty (collectively, the Connecticut Plaintiffs) will take the oral deposition of David Jones. The deposition will commence on October 2, October 3, and October 4, 2023, starting at 9:00 a.m. Central Time each day at Jackson Walker LLP, 100 Congress Avenue, Suite 1100, Austin, Texas 78701, or at such other date, time and place as the parties may agree.¹

Please be advised that the scope of the deposition includes, but is not limited to, any matter relevant to: (i) any Document² produced in response to any discovery request in this case or in the FSS Case, including any banking records and transaction Documents; (ii) the Debtor's Assets, liabilities, and financial condition; (iii) any Payments, Transfers, Gifts, or

¹ This notice amends the *Connecticut Plaintiffs' Notice of Rule 2004 Deposition of David Jones* [ECF No. 421].

² Capitalized terms undefined herein have the meaning ascribed to them in the *Notice of the Official Committee of Unsecured Creditors' Bankruptcy Rule 2004 Examination of David Jones* [ECF No. 275].

distributions of any Assets involving the Debtor or his entities, directly or indirectly; (iv) any agreements or contracts between You and the Debtor concerning any Assets; (v) any plan that may be introduced in the Debtor's bankruptcy or in the FSS Case, insofar as it concerns the Debtor; and (vi) any topics covered in the *Subchapter V Trustee's Initial Findings of Free Speech Systems, LLC Investigation* filed on the docket in the FSS Case at ECF Nos. 549 and 550, and the supplement thereto filed at ECF Nos. 573 and 574.

Dated: September 11, 2023

CAIN & SKARNULIS PLLC

By: /s/ Ryan E. Chapple

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*Counsel to Richard M. Coan, as Chapter
7 Trustee for the Estate of Erica Lafferty*

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 2004-1, I hereby certify that counsel for the Connecticut Plaintiffs conferred with counsel for David Jones on the Rule 2004 requests on August 31, 2023. Counsel for David Jones does not object to this Amended Notice.

/s/ Christopher Mattei
Christopher Mattei

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Rule 2004 Amended Notice of Deposition has been served on counsel for Debtor, Debtor, and all parties receiving or entitled to notice through CM/ECF on this 11th day of September 2023.

/s/ Ryan E. Chapple
Ryan E. Chapple